

**BEFORE THE STATE CORPORATION COMMISSION  
THE STATE OF KANSAS**

**In the Matter of the Application of        )  
Mid-Kansas Electric Company, LLC        )  
for Approval to Make Certain Changes    )  
in its Charges for Electric Service        )**

**Docket No. 09-MKEE-\_\_\_\_-RTS**

**DIRECT TESTIMONY OF  
NOMAN L. WILLIAMS**

1 **I. INTRODUCTION**

2 **Q. Please state your name.**

3 A. My name is Noman L. Williams.

4

5 **Q. Are you an officer of Mid-Kansas Electric Company, LLC (“Mid-Kansas”)?**

6 A. Yes, I am Vice President of Transmission Services & Engineering for Mid-  
7 Kansas.

8

9 **Q. By whom are you employed and what is your business address?**

10 A. I am employed by Sunflower Electric Power Corporation (“Sunflower”). My  
11 business address is 301 W. 13<sup>th</sup> Street, Hays, Kansas.

12

13 **Q. Are you an officer of Sunflower?**

14 A. Yes, I am the Vice President of Transmission Services & Engineering for  
15 Sunflower.

16

17 **Q. What is Sunflower’s relationship with Mid-Kansas?**

18 A. Sunflower provides contract services to Mid-Kansas for all of the generation and  
19 transmission activities of Mid-Kansas.

20

21 **Q. Please provide information about your educational background and your  
22 work experience.**

1 A. In 1981, I graduated from Washington State University with a Bachelor of  
2 Science Degree in Electrical Engineering with a minor in Economics. In 1982  
3 and 1983, I completed 20 credit hours of course work in the MBA program at  
4 Eastern Washington University. In 2003, I completed the MBA program at  
5 Colorado State University. From 1981 to 1988, I was employed at Washington  
6 Water Power Company in Spokane, Washington as a transmission planning  
7 engineer and as a distribution engineer. During that time I was responsible for (1)  
8 developing plans and schedules for transmission facilities by performing and  
9 analyzing load flow and stability studies and (2) providing engineering support  
10 for all company underground distribution and 1000 miles of distribution line  
11 serving 200 MW of load. In May 1988, I began employment with Sunflower as a  
12 transmission engineer. In 1990, I was promoted to Supervising Engineer in the  
13 transmission engineering area. In April 1997, I was promoted to Manager,  
14 Transmission Engineering. In August, 1997, I was promoted to Manager,  
15 Transmission Services I was subsequently promoted to Senior Manager,  
16 Transmission Services in August, 2000 and Executive Manager, Transmission  
17 Services and Engineering in May, 2005. In May, 2006, I was promoted to my  
18 current position as Vice President, Transmission Services & Engineering for  
19 Sunflower and Mid-Kansas.

20  
21 **Q. Do you belong to any professional organizations?**

22 A. Yes, I do. I am a member of IEEE and NSPE.

1 **Q. Have you testified before the Kansas Corporation Commission on previous**  
2 **occasions?**

3 A. Yes, I have testified before the Commission in Docket 96-SEPE-680-CON,  
4 Docket 08-ITCE-936-COC and Docket No. 08-PTWE-1022-COC.

5  
6 **Q. What is the purpose of your testimony today?**

7 A. The purpose of my testimony is to support and explain Mid-Kansas' position that  
8 the transmission assets operated by Mid-Kansas meet the criteria of Transmission  
9 Facilities as defined in Attachment AI of the Southwest Power Pool Open Access  
10 Transmission Tariff (SPP-OATT) and request that the Commission affirm this  
11 position.

12  
13 **III. GENERAL BACKGROUND ON MID-KANSAS**

14 **Q. Please describe the Mid-Kansas organization.**

15 A. Mid-Kansas is a limited liability company operated on a not-for-profit basis that  
16 was formed by the Sunflower Members<sup>1</sup> to own and operate the Kansas electric  
17 assets of Aquila, Inc. Those assets included generation and transmission  
18 facilities, electric distribution facilities that serve a certified service territory  
19 consisting of approximately 71,000 meters in 31 counties, and 22 full and partial  
20 wholesale requirements municipalities that serve approximately 23,000 meters<sup>2</sup>.

21 The acquisition of the Kansas electric assets was approved by the Commission on

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<sup>1</sup> The Mid-Kansas Members are Lane-Scott Electric Cooperative, Inc.; Prairie Land Electric Cooperative, Inc.; The Victory Electric Cooperative Association, Inc.; The Western Cooperative Electric Association, Inc.; Wheatland Electric Cooperative, Inc. and; Southern Pioneer Electric Company, which is a wholly-owned subsidiary of Pioneer Electric Cooperative, Inc.

<sup>2</sup> As of the date that the Aquila Kansas electric properties were acquired by Mid-Kansas, April 1, 2007.

1 February 23, 2007, in Docket No. 06-MKKEE-524-ACQ and closed effective April  
2 1, 2007.

3  
4 **Q. Please describe how Mid-Kansas is operated.**

5 A. Since the closing date, the Mid-Kansas Members have operated all distribution  
6 facilities and have served the former Aquila customers on Mid-Kansas's behalf,  
7 all pursuant to Commission approved agreements. Effective December 31, 2007,  
8 pursuant to the Commission's order in Docket No. 08-MKKEE-099-MIS,  
9 ownership of the distribution facilities were transferred from Mid-Kansas to its  
10 respective Members. Sunflower operates the generation and transmission assets  
11 of Mid-Kansas pursuant to the Service and Operation Agreement between  
12 Sunflower and Mid-Kansas.

13  
14 **Q What is your relationship to Mid-Kansas?**

15 A. As noted above, Sunflower operates Mid-Kansas' generation and transmission  
16 facilities for Mid-Kansas. Thus, I have responsibility to oversee transmission  
17 matters for Mid-Kansas.

18  
19 **Q. Please explain the relationship between Sunflower and Mid-Kansas.**

20 A. Mid-Kansas, like Sunflower, is a public utility, fully regulated by the  
21 Commission under K.S.A. 66-104. Both own and operate electric generation and  
22 transmission facilities and both are owned (directly or indirectly) by the same six  
23 distribution cooperatives. However, each is a separate legal entity with separate

1 and distinct corporate interests. Thus, when Sunflower employees act on behalf  
2 of Mid-Kansas, they must adhere to Mid-Kansas,' not Sunflower's, corporate  
3 interests.

4  
5 **Q. Please provide detail on the generation and transmission facilities Mid-**  
6 **Kansas owns within the state of Kansas?**

7 A. Mid-Kansas owns approximately 1083 miles of transmission line facilities and  
8 associated substation facilities and 395 MW of gas-fired generation. The  
9 transmission facilities consist of 932 miles of 115 kV, 76 miles of 138 kV and 171  
10 miles of 230 kV transmission line and 40 substations. As noted above, Mid-  
11 Kansas also currently retains the exclusive right to serve approximately 71,000  
12 retail meters and serves approximately 23,000 additional retail meters through full  
13 and partial wholesale power contracts with 22 municipalities.

14  
15 **Q. Please explain why the Commission needs to affirm that the transmission**  
16 **facilities of Mid-Kansas are compliant with the requirements of SPP-OATT**  
17 **Attachment AI.**

18 A. In FERC Docket No.ER-05-1285-000, SPP sought approval of a new definition of  
19 transmission facilities to be incorporated into Attachment AI of the SPP-OATT  
20 ("Attachment AI"). The compliance filing of Attachment AI specified the criteria  
21 of "Transmission Facilities" to be included in Attachment AI. Attachment AI  
22 required that within three years from the acceptance by FERC that each  
23 Transmission Owner file a request based on the criteria contained within

1 Attachment AI with its appropriate regulatory authority or authorities for a  
2 determination as to which of its facilities are Transmission Facilities. The three  
3 year time frame expired in September 2008. Prior to this date, Mid-Kansas  
4 submitted a filing with the Commission in Docket No. 09-SNFE-315-MIS,  
5 asserting that all of its transmission facilities meet the requirements of Attachment  
6 AI, and committed to provide the Commission further information with respect to  
7 Mid-Kansas transmission facilities in Mid-Kansas' next general rate case filing.  
8

9 **Q. Specifically, what criteria in Attachment AI are used to define “Transmission**  
10 **Facilities”?**

11 A. Transmission Facilities as defined in Attachment AI are those facilities that meet  
12 the following criteria:

13 1. All existing non-radial power lines, substations, and associated facilities,  
14 operated at 60kV or above, plus all radial lines and associated facilities operated  
15 at or above 60kV that serve two or more eligible customers not Affiliates of each  
16 other. Rate treatment for transmission upgrades completed after October 1, 2005  
17 will be determined pursuant to Section 1.3(h) of the Tariff. For purpose of the  
18 application of these criteria, “open loops” are radial lines. Additionally, at such  
19 time an existing radial would be eligible for inclusion in rates on the same basis as  
20 the remainder of the facilities in the loop.

21 2. All facilities that are utilized for interconnecting the various internal zones  
22 to each other as well as those facilities that interconnect SPP with surrounding  
23 entities.

1           3.       Control equipment and facilities necessary to control and protect facilities  
2           qualifying as Transmission Facilities.

3           4.       For substations connected to power lines qualifying as Transmission  
4           Facilities, where power is transformed from a voltage higher than 60kV to a  
5           voltage lower than 60kV, facilities on the high voltage side of the transformer will  
6           be included with the exception of transformer isolation equipment.

7           5.       The portion of the direct-current interconnections with areas outside of the  
8           SPP region (DC ties) that are owned by a Transmission Owner in the SPP region,  
9           including those portions of the DC tie that operate at a voltage lower than 60kV.

10          6.       All facilities operated below 60kV that have been determined to be  
11          transmission pursuant to the seven (7) factor test set forth in FERC order No. 888,  
12          61 Fed Reg. 21,540,21,620 (1996), or any applicable successor test.

13  
14       **Q.     Mr. Williams, have you reviewed the transmission facilities of Mid-Kansas to**  
15       **see if they meet the criteria set forth in Attachment AI?**

16       A.     Yes, I have.

17  
18       **Q.     In your professional opinion, do all of the Mid-Kansas transmission facilities**  
19       **meet the criteria in Attachment AI?**

20       A.     Yes.

21  
22       **Q.     Are there any transmission facilities of Mid-Kansas that you would like to**  
23       **offer further comment with respect to their applicability to Attachment AI?**



1 A. Yes. Mid-Kansas has three radial transmission lines that I would like to offer  
2 further explanation as to why they should be classified as Transmission Facilities  
3 within Attachment AI. These 115 kV radial lines, as shown on Exhibit NLW -1,  
4 are identified as West Dodge to Haggard, Great Bend Station to Otis and Pioneer  
5 Tap to Ellsworth.

6

7 **Q. Please explain why these radial 115kV lines are properly classified as**  
8 **transmission.**

9 A. All three of the radial lines are properly classified as transmission because they  
10 provide a wholesale for wholesale delivery of power and energy to the Mid-  
11 Kansas Members, wholesale municipalities, to network transmission customers  
12 (NITS) such as KEPCo, KMEA and KPP and provide for the interconnection of  
13 wholesale generation (Grey County wind farm).

14

15 **Q. Are there any transmission facilities of Mid-Kansas that could be properly**  
16 **classified as distribution?**

17 A. No, because all three of these transmission lines provide a form and function  
18 above distribution.

19

20 **Q. What is Mid-Kansas specifically asking of the Commission?**

21 A. Mid-Kansas requests that the Commission confirm that all of the transmission  
22 facilities of Mid-Kansas meet the criteria of Attachment AI.

23

**VIII. CONCLUSION**

1

2 **Q. Does this conclude your testimony?**

3 **A. Yes, it does.**

4

5

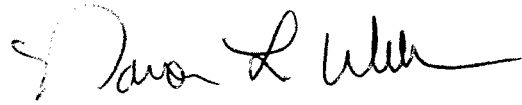
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7

VERIFICATION OF NOMAN L. WILLIAMS

STATE OF KANSAS            )  
  ) ss:  
COUNTY OF ELLIS         )

Noman L. Williams, being first duly sworn, deposes and says that he is Noman L. Williams referred to in the foregoing document entitled "Direct Testimony of Noman L. Williams" before the State Corporation Commission of the State of Kansas and that the statements therein were prepared by him or under his direction and are true and correct to the best of his information, knowledge and belief.



\_\_\_\_\_  
Noman L. Williams

**SUBSCRIBED AND SWORN** to before me this 12<sup>th</sup> day of June,  
2009.



\_\_\_\_\_  
Notary Public

My Appointment Expires: 11/05/12

